

Western District of  
Wisconsin



Brandon D Bradley Sr  
Plaintiff

1985 complaint  
pursuant to 42 U.S.  
C. § 1985, § 1986

cover page

VS.

- |                 |                       |
|-----------------|-----------------------|
| ① Leigha Weber  | ⑫ Anthony Meli        |
| ② Kyle Tritt    | ⑬ Sgt Bikowski        |
| ③ Joseph Beahm  | ⑭ Robert Beahm        |
| ④ Co Bade       | ⑮ Co Dorn             |
| ⑤ Co Kyle Oneal | ⑯ Co Bliegler         |
| ⑥ Co Wodack     | ⑰ Co McCawley         |
| ⑦ Co Leopold    | ⑱ Co O'Neill (Thomas) |
| ⑧ Co Jones      | ⑲ Nurse Taplin        |
| ⑨ Co Pohl       | ⑳ Co Giebel           |
| ⑩ Co Rosenthal  |                       |
| ⑪ Corene Giebel |                       |
- ⑳ Co Ridley ㉑ Co Barkhurst  
㉒ Sgt Fisher ㉓ Lt Dingman ㉔ Lt  
Burns ㉕ Lt Sanchez ㉖ Co Adderton

- 28 Sheriff of Dodge Co
- 29 Tammy Wild
- 30 Dep Sheriff Does 1-30
- 31 Lt Brian Drumm
- 32 Gwen Vick
- 33 Jen Kacyon
- 34 Mark Jensen
- 35 Dr Miller
- 36 Dr Deblanc
- 37 Dr Engstrom
- 38 Dr Van Buren
- 39 Dr Gruber
- 40 Dr McLaren
- 41 Larry Fuchs  
(HC W.D.)
- 42 Marchant
- 43 William C Greisbach

Aka defendants  
(# 1-43)

acted under color  
of state and federal  
law at all times during  
this complaint and are  
sued in their individual  
and official capacities

Complaint with Jury Demand

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③

## Introduction

①

This is a civil rights action filed Brandon D Bradley Sr, alleging retaliation, excessive force, failure to protect, 8th amendment excessive bail and fines, due process, equal protection, battery tort, negligence medical malpractice, 8th amendment cruel and false unusual punishment, 6th and 7th speedy trial imprisonment violations 13th amendment involuntary servitude.

The defendants violated plaintiff 1st, 6th, 7th, 8th 14th and State tort laws. Plaintiff is seeking damages pursuant to 42 U.S.C. § 1985 and 1986 and relief

## Supplemental Jurisdiction

②

The Western District of Wisconsin is granted jurisdiction over plaintiff's claims of violation of federal constitutional rights under 42 U.S.C. §§ 1331(c) and 1343

The court has supplemental jurisdiction over the plaintiff's state law tort claims under 28 U.S.C. § 1367.

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### Facts ③

On 3-16-18 and 6-2-18 Bikowski, Wodack, Jones, Pohl, Oneal, Oneill, Bliegler, McCawley, Dorn, Adderton, Fisher, and Beahm (6-2-18) used 'excessive' force on plaintiff while she was fully shackled not resisting. The attacks consisted of punching, kicking, kneeling, elbowing, slapping, slamming head against walls and/or doors, tazing while plaintiff was standing in water, stomping on shackles (legs), squeezing handcuffs to the point they couldn't tighten anymore, choking plaintiff in a backwards judo hold, and denying plaintiff medical treatment after both attacks.

④ On 7-19-18 plaintiff addressed both attacks at a preliminary hearing for 18-cv-158. Also during this hearing, plaintiff addressed Joseph Beahm assisting in the suicide of Marques Childs in 2015. Wodack and Rosenthal were present at this hearing, and had to report to Meli, any events that occurred during this hearing.



pg ⑤

⑤

To hinder 1985, 1986, 1983, John Doe proceedings, and **cause** repeated delays in 18-cf. 158 Anthony Meli authorized, oversaw, and facilitated the **altering** of video, audio and paper evidence

(Meli) 7

⑥ He ordered Bilkowski, Beahm, Leopold, Jones, Wodack, Fisher, Oneal, Oneill, Adderton, Dingman, **Bade**, McCawley, Taplin, Pohl, Dorn, Bliegler, Tritt, Ridley, Barkhurst, Sanchez, Burns, **Rosenthal**, to switch Leopold and Kyle Oneal for **Bade** (3-16-18) and switch Sanchez out for **Dingman** and **Burns**. ■ During both attacks Leopold was holding the camera. Dingman deliberately **deleted** the (6-2-18) hand held cam footage shot by Leopold.

⑦ The defendants in par ⑥ put a spirit hood on somebody ■ they claim was plaintiff. In the re-enactments on 3-16-18 and 6-2-18, they did every thing by the book, when in reality they used excessive force outlined in par ①

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⑧ Tritt, Beahm, Bade, Oneal Wodack, Leopold Jones, Pohl, Bikowski, Dorn, Bliegler, McCawley, Oneill, Ridley, Fisher, Barkhurst, Fisher Dingman, Burns, Sanchez, Adderton and Mel I gave Corene Giebel the fabricated video, a udio, paper evidence to put in my D.O.C. social service file which she did

⑨ On the 3-16-18 incident (re-enactment) Tritt says "Grab a spit hood [redacted] Rosey" "grab the bolt cutters Bade". At no time was Rosenthal or Bade present, or was plaintiff at anytime wearing a spit mask or hood. (see 20-cv-81 W.C.G.)

⑩ The exact alterations were fabricated incident reports, audio, hallway footage strip cage footage, in cell footage, fabricated documents. On multiple occasions Giebel (Corene) said that [redacted] strip cage and in-cell footage of the 6-2-18 incident, did not exist (20-c-82 W.C.G.)

⑪ To further the fraud, Corene Giebel gave the fabricated cell and strip cage footage to Co Giebel to give to Robert

⑦

Beahm to enter into my CCI social service file. The evidence was used against me at summary judgment (20-cv-82 WCG)

⑫ In both excessive force incidents (3-16

6-2-18) Taplin, Vick, Kacyon, Jensen, Miller, Deblanc, Engstrom, Van Buren, Gruber, McLaren, Marchant, either physically witnessed the attacks, or became aware of attacks via PSU, ASU, inter view request slips, and/or plaintiff physically showing them the injuries cell side and failed to treat the injuries. Plaintiff even went to the extreme to smear pen ink and feces into wounds to get medical attention and was still refused treatment. (20-c-561, 563)

⑬ On 6-1-18 Dr Deblanc put plaintiff in a cell even after plaintiff identified herself as a transgender identified under 500.70.27 [REDACTED] at the request of Joseph Beahm (20-c-563)

⑭ On 6-2-18 to 6-7-18 plaintiff was on obs status and have to talk to engstrom, gruber, McLaren, miller, deblanc, to get off obs. From 6-2-18 to 6-7-18 plaintiff showed these defendants the physical injuries (20-c-563)

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⑮ on 6-2-18 to 6-7-18 plaintiff was on obs and wrote psu slips, hsu slips, showed injuries to Jensen, Vick Kacyon, Marchant to receive medical attention (Richard Smitheran wrote slips) **due to** plaintiff being on obs plaintiff had to receive med s from Hsu. At no time was plaintiff offered help from PSU/HSU (20-c-563)

⑯ To cover up for security staff Kacyon, Vick Jensen, Marchant, Miller, McLaren, Deblanc, Engstrom, Gruber VanBuren, fabricated obs assessments, cell side assessments, medical documents, and entered them into my PSU/HSU files, from 6-1-18 to 7-19-18 (20-c-561, 563)

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① Sheriff of Dodge Co ② Drumm ③ Wild  
④ Does 1-30

① on or about Mar 2018 plaintiff told Lt Brian Drumm that WCI staff had attacked him on 3-16-18, and that WCI staff was corrupt and the his dept (Dodge Co) needed to investigate them



⑨

② on 7-19-18 plaintiff conducted pre lim hearing for 18-cf-158. Lt Brian Drumm admitted he failed to protect me, after I told him I was attacked on 3-16-18 6-2-18 and Beahm assisting in the suicide of Marques Childs.

③ Wild added words, took words out, and blurred out the last name of Childs, to protect Drumm. She altered the transcripts with words like not relevant to Ms Tiens tra's objection, twisting staff members names who were involved in the attacks, saying that there was no video evidence of the attacks, and repeatedly saying she could n't understand what I was saying

④ From 7-19-18 till Mar 2019 I was not allowed to attend court, except for a "change of plea hearing" where plaintiff gave MS Jessica A Klein key evidence in civil litigation, including the declaration of Jade Eichman #581348

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⑤ Ms Klein withdrew, and I was appointed David Zarwell. Mr Zarwell told me to plead guilty, and called me a weird guy. I told him if he represented me at trial I would "kick his ass"

⑥ He withdrew and I went pro se

⑦ I was pro around Feb 2019 for throwing water on Co Barkhurst (19-cf-77) from WCI to CCI.

⑧ Upon arriving to CCI I learned that seg inmates had to write in rubber pencil, which I had never wrote with. I asked the counts to appoint me counsel. I was appointed Nolan Jensen.

⑨ He called me at CCI, and I told him I wanted to view the suit up team video (see 20-cv-81) he told me to bring the popcorn!

⑩ Before this court appearance Co's Kleber and Shulze threatened to activate the tazer box connected to my leg at the institution, had

⑪

a conversation about a Klan meeting in TX in the van, and at the courthouse Skulze whispered to Kleeber, "do you think he knows what's going on."

⑫ Once I got upstairs at the courthouse I told Nolan that I wanted to see the video. He said **you** wanna see the part where your **by the stairs**, don't you. I said yep

⑬ When I saw the video, I **couldn't** believe my eyes. WCI staff had altered and fabricated the hand held cam footage (see 20-cv-81 WCG, and planned on entering it as a **exhibit** in 18-cf-158

⑭ Once I got into the courtroom, I threatened Ms Tienstra, Judge Pfit Zinger, and once I got to the holding area, I **struck** Kleeber in the face

⑮ Once I got back to the institution Nolan called me and said "Grand on what happened" I said "get

me a evidentiary hearing.

⑮ On the morning of my evidentiary hearing CCI staff ~~attacked~~ me, Strapped me into the restraint chair with no range of motion, and transported me to Dodge Co Jail over 1 1/2 away

⑯ Once I made it to the jail, I crossed examined Capt Tritt about the validity of the video evidence being used against me. He committed perjury when he said the video was real, and that Beahm didn't threaten me before the video started (See 20-ev-31 WCG)

⑰ Also during this hearing I had 1A Court for 19-cf-77 and a bail modification for \$10,500 for body expel. The two alleged victims were Co's Leopold and Barkhurst (WCI employees)

⑫



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⑮ On 4-23-19 I discharged from the D.O.C. on 6-12-19 I was re-admitted back to the D.O.C.

⑯ On 8-28-19 Leopold, Tritt, and Anthony P. Mell took the stand and committed perjury, by giving false testimony regarding the events on 3-10-18 (18-cf-158) where I was accused of throwing water on Leopold shoes. (19-cf-77) was dismissed. I was found not guilty of Assault by Prisoners 18-cf-158.

⑰ From Mar 2018 to Aug 2019 plaintiff made multiple demands for discovery, speedy trials, John Doe investigations, reported being sexually and physically attacked by WCC staff, and Orion Gutowski, being threatened by

(14)

Joseph Beahm, fabricated evidence being used against plaintiff, and Sheriff of Dodge Co, Does 1-30, Drumm and Wild did not take proper measures and precautions to ensure plaintiff's safety. Plaintiff made the outlined defendants in par (20) aware verbally and in writing. Plaintiff made these allegations while physically present in Dodge Co Jail.

(21) To defraud plaintiff in civil litigation defendant William C Greisbach conspired with WCI / CCI / Dodge Co Sheriff's dept to strike plaintiff out, prevent plaintiff from filing 1983 / 1985-86 complaints, taking 23 pages out of 20-cv-709 complaint, steal transcripts from 19-cv-77, and civil cases 20-c-81 82 W. C. G. William Greisbach is a federal judge in the Eastern District (Green Bay)

(15)

(22) Plaintiff has filed HC petitions (4) alerting defendant Fuchs that the State of WI has not had the legal jurisdiction to detain plaintiff from 6-8-17 to 6-1-21. Plaintiff alleges false imprisonment at all times during this complaint which includes WCI / CCI

(23) 17-cm-1677: on 6-8-17 plaintiff was arrested for a crime he did not commit, and can prove a ongoing conspiracy to continue to keep plaintiff falsely imprisoned.

(24) After the "rulings" at summary judgment by Judge Greisbach, plaintiff respectfully prayed the P.R.E.A. coordinator investigate both incidents with law enforcement investigations. Ms Leigh a Weber said that "WCI" thoroughly investigated and she would not forward my request to law enforcement

(16)

(25) on the 3-16-18 and 6-2-18 incidents plaintiff was fully nude when WCI staff beat the kilt and privacy towel off plaintiff. (20-cv-81, 82 WCB)

(26) on the 6-2-18 incident Beahm groped plaintiff's buttocks, penis, and chest while calling me a nigger (see 20-cv-82 WCB)

(27) Leigha Weber is the state P.R.E.A coordinator and is responsible for all P.R.E.A. operations in municipal facilities, and W.I.D.O.C. facilities, and plaintiff makes her the main defendant #1 due to sexual and physical assault on 3-16-18 and 6-2-18.

(28) Robert Beahm and Corene Giebel are and were records office supervisors from 2017 to 2021, and were in control of my social service files at all times during this complaint



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29) Sheriff of Dodge co, is the Sheriff of Dodge Co Sheriff's Dept in Juneau WI, and is responsible for actions taken by his employees, operations and the **safety** and security of inmates in his/her custody (20-c-709, 1715 WCG)

30) Tritt, Leopold, Beahm, **Barkhurst**, Ridley and Sanchez supervised and/or witnessed the attacks on 6-2-18 and or 3-16-18 and failed to intervene (20-c-82) WCG

31) Anthony P Meli was the security director at WCI at all times during this complaint, and was responsible for security operations, staff equipment, ~~and~~ and the misconduct on 3-16-18 - ~~on~~ 6-2-18, and the cover up afterwards (20-c-81, 82 WCG)

32) Plaintiff suffered injuries consisting of cuts, bruises, tazer burns

(18)

black eyes, concussion symptoms,  
PTSD, paranoia, shoulder injuries  
numbness in hands and feet  
depression, anxiety (20-C-81, 82 WCG)

(33) Co Leopold caused plaintiff unnecessary delays in 18-CF-158 by saying he was on military duty at the evidentiary hearing for 19-CF-77. Plaintiff suspect we lied to ADA Tienstra when they said he was on duty in "California"

(34) Due to plaintiff being housed at CCJ and ~~██████████~~ the conspiracy between defendants in the East and Western district, plaintiff exercises his/her right to grant the West jurisdiction to hear this claim

(35) From 6-8-17 to 6-1-21 the WI D.O C. has not had the legal justification or right to house or detain plaintiff

(19)

## Exhaustion of Remedies

Plaintiff has formally and informally exhausted all available remedies

## Claims For Relief

Declare that Weber, Tritt, Beahm, Bade, Oneal (K),  
Wodack Jones, Leopold, Pohl Rosenthal,  
Giebel Meli, Bikowski, R. Beahm, Dorn  
Bliegler, McCawley, Oneill (T) Taplin, CoG  
lebel, Aidley Barclhurst, Fisher, Dingman  
Lt Burns, Sanchez Adderton, Sheriff  
of Dodge Co, Wild, Drumm, Vick, Kacyo  
n, Jensen, Miller Deblanc, Engstrom, Van  
Buren, Gruber, McLaren, Fuchs Ch.C.  
Marchant, Greisbach, aka defendants

# 1-43

(20)

conspired jointly and severely to defraud plaintiff in civil litigation (20-cv-81, 82, 558, 561, 563, 709, **1715 WCG**) criminal cases (18-cv-158, 19-cv-77) by using excessive force on plaintiff on 3-16-18 and 6-2-18 while plaintiff was fully shackled not resisting, deliberate indifference / failure to protect, by knowing plaintiff suffered injuries from the beatings, and failing to treat the injuries, and/or stop the beatings, prevent further injury's, or report the attacks. They also deter and/or hindered plaintiff from **access** to the courts and to redress grievance by altering evidence using threats, intimidation, excessive force, causing plaintiff to be struck out under 42 U.S.C. § 1983 (PLRA) Leopold claiming to be on military duty during bail **modification** hearing, and giving **perjured** testimony in criminal and civil court. excessive bail and fines (8th amendment) by **raising** my bail to 10,500 for **frivolous crimes**. . 14th amendment due process / equal protection violations by preventing plaintiff from properly



(a)

defending him self in ~~criminal~~ criminal and civil court with fraud, beatings, attacks, intimidation, and false imprisonment. The defendants used falsified evidence against plaintiff in cases 20-c-8182, 709 WCG and 18-cf-158 and 19-cf-77. As a prisoner / pretrial detainee plaintiff is apart of a **Suspect** group / all of one. Plaintiff was treated differently than every other inmate in a similar situation as plaintiff, with the use of falsified evidence, torture, beatings, intimidation and false imprisonment. The defendants also violated plaintiff state tort rights of negligence, battery tort, medical malpractice, and false imprisonment with the beatings, disregard for plaintiff health and safety, failure to treat plaintiff's injuries, while plaintiff was falsely imprisoned between 6-8-17 to 6-1-21. Plaintiff alleges 1st amendment, 6th 7th and 8th 13th 14th and state law claims

(22)

for the blatant disregard for plaintiffs health, safety, rights, and freedom during this complaint. The plaintiff caused plaintiff pain suffering and injury deprived plaintiff of life liberty and ~~property~~ property, deprived plaintiff of rights to access the courts deprived plaintiff of right to be free from slavery and/or false imprisonment. This complaint is drafted, formatted and respectfully submitted as a 42 U.S.C. § 1985, 1986 civil rights conspiracy / R.I.C.O. complaint and clearly outlines and alleges conspiracy in full and graphic detail.

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## Relief Requested

\$10,000,000 monetary damages  
\$10 nominal

\$5,000,000 punitive damages

T.R.O. against W.I. D.O.C.

Grant such other relief as it may appear  
plaintiff is entitled to

## Verification

Pursuant to 28 U.S.C. § 1746

I declare under penalty of perjury  
the foregoing is true and correct

*Brandon D. Smith*

4-30-21